

November 7, 2013

VIA Email to SEPAdesk2@dfw.wa.gov

RE: DNS #13-075 MARINE SHORELINE DESIGN GUIDELINES (PUGET SOUND)

Dear Mr. Zeigler:

We appreciate the opportunity to review the draft Marine Shoreline Design Guidelines. Though our work load did not permit a thorough read of the entire 188 pages, we were able to skim through the document and focus on a few key areas. We offer the following comments/observations:

SEPA Comment:

Page 75

The Flow chart on this page offers a useful tool for determining the appropriate shoreline defense. Has WDFW conducted an assessment to estimate the number of Puget Sound properties that would result in the determination “hard armor”? What is the cumulative effect?

General Comments:

Page 113

“LWD not suitable in a High Wave energy environment.” Or is it? We would ask Hugh Shipman and Jim Johannessen to consider Port Townsend’s North Beach area. In our estimation, the natural build-up of drift logs seems to work well to protect these properties in what appears to be a high wave energy environment?

Regarding the cost of hard armoring, the report notes that mitigation is an added cost for hard armoring; this fact cannot be overstated. Pursuant to “no net loss” mandates under the Shoreline Management Act (SMA), local Shoreline Master Programs (SMP’s) are being written to discourage hard armoring. Applicants proposing hard armoring will be required to submit additional analysis to justify the proposal, assess cumulative impacts and include a “no net loss” determination. They must include a mitigation and monitoring plan. Then add the cost of the actual implementation and monitoring.

The report calls for a “qualified professional”. Can you expand on what constitutes a qualified professional (similar to the specificity provided in the RCW’s for engineering geologist)? Does WDFW or the Department of Licensing maintain a list of “qualified professionals”?

Length of the Document: Although very informative, will people read it? DOE staff encouraged brevity in SMPs. Perhaps this document will have an Executive Summary or an abbreviated version for “staff” or “for the homeowner”?

We look forward to release of the final document and associated training opportunities.

Best regards,

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